

THE HONORABLE BRIAN A. TSUCHIDA

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

CHRISTOPHER J. HADNAGY, an individual;
and SOCIAL-ENGINEER, LLC, a
Pennsylvania limited liability company,

Plaintiffs,

v.

JEFF MOSS, an individual; DEF CON
COMMUNICATIONS, INC., a Washington
corporation; and DOES 1-10; and ROE
ENTITIES 1-10, inclusive,

Defendants.

No. 2:23-cv-01932-BAT

DECLARATION OF COLIN HADNAGY
IN SUPPORT OF PLAINTIFFS'
RESPONSE TO DEFENDANTS' MOTION
FOR SUMMARY JUDGMENT

I, Colin Hadnagy, declare under penalty of perjury under the laws of Washington State
as follows:

1. I am over the age of 18, and competent to testify to the matters set forth herein; and
make this declaration of my own personal knowledge.

2. Jess Levine and I had a friendship before becoming coworkers, that was mostly
focused around gaming

3. I, do not view Jess as a trustworthy confidante.

4. Jess was often found gossiping and sharing personal information in Discord calls
with her Collegiate Overwatch team.

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FREY BUCK
1200 FIFTH AVENUE, SUITE 1900
SEATTLE, WA 98101
P: (206) 486-8000 F: (206) 902-9660

1 6. I never told Jess that my father, Christopher Hadnagy, called me an idiot or
2 incompetent.

3 7. According to Jess, she has witnessed my father make degrading comments about/to
4 me, such calling me a retard, or stupid, on multiple occasions. These events never took place.

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6
7 I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE UNITED
8 STATES OF AMERICA AND STATE OF WASHINGTON THAT THE FOREGOING IS TRUE
9 AND CORRECT TO THE BEST OF MY KNOWLEDGE.

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11 Executed at Denver, Colorado, this 14 day of March, 2025.

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Colin Hadnagy

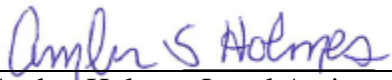
CERTIFICATE OF SERVICE

The undersigned certifies under the penalty of perjury according to the laws of the United States and the State of Washington that on this date I caused to be served in the manner noted below a copy of this document entitled **DECLARATION OF COLIN HADNAGY IN SUPPORT OF PLAINTIFFS' RESPONSE TO DEFENDANTS' MOTION FOR SUMMARY JUDGMENT** on the following individuals:

David Perez, WSBA #43959
Matthew J. Mertens (Pro Hac Vice)
Lauren A. Trambley (Pro Hac Vice)
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☐ Via USPS
☒ Via Electronic Mail
☒ Via Electronic Filing (CM/ECF)

DATED this 14 day of March 2025 at Seattle, Washington.


Amber Holmes, Legal Assistant